

EXHIBIT 4

EXHIBIT F

From: [Smith, Erin](#)
To: [Sullivan, Brady M.](#); [Grinnell, Kaydene](#); [Hershey, Samuel](#); [Lauria, Thomas E](#); [Shore, Christopher](#); [Zatz, Andrew](#); [Bakemeyer, Brett](#); [Chen, Tony](#); [Chen, Ken](#); [Chemborisov, Gleb](#); [Yoo, Jade](#); [Kates, Paula](#)
Cc: [Dugan, James](#); [Lombardi, Stuart](#); [Morton, Edmon \(External\)](#); [Lunn, Matthew \(External\)](#); [Mielke, Allison S.](#); [Borovinskaya, Shella](#); [Kass-Gergi, Yara](#); [Sinclair, Debra](#); [FRGWillkie](#); [Michael J. Farnan](#)
Subject: RE: RE: RE: In re Franchise Group, Inc., et al.; Case No 24-12480 (JTD) (Discovery Responses and Objections)
Date: Monday, November 25, 2024 10:13:42 PM
Attachments: [image001.png](#)

*** EXTERNAL EMAIL ***

Brady and Team:

Thank you for getting back to us with a revised proposal and some additional color. While we would very much like to work with you on a reasonable compromise, we think your proposed solution does not get us there. To that end, we would benefit from some additional context and propose some potential solutions below.

First, it would be useful if you could provide a little more context about the number of hits. You mention that our revisions returned over 50K hits, excluding documents you already have reviewed and produced. Can you please share with us how many hits Debtors' original search terms returned? How many additional hits are captured by this revised proposal?

Second, we see no justification in your email for cutting certain of the search terms we've proposed, for example, RSA or projections. We understand the RSA and DIP were negotiated in tandem. Additionally, the Debtors' financial projections must have been central to the negotiation of the DIP that Debtors are seeking to have approved by the Court.

Third, we are very happy to work with you to brainstorm some exclusions you can run on the search terms or work together to find other solutions. To take one example, it seems that the false positives with Fusion can be easily addressed by identifying other terms that should screen out the irrelevant uses of Fusion you have identified. Similarly, while we can understand that "financing" or "facility" could return some false positives, given the relatively short time period, we think it is important that any in or out of court alternatives to the DIP considered by the Debtors be captured in the search terms. We are concerned that these revised proposed search terms would miss any discussions of DIP alternatives that never use the term "DIP" and iterations of 2L or Holdco or the DIP Budget. We are open to your suggestions on search terms that would capture communications about DIP alternatives considered by the Debtors.

Fourth, with respect to your refusal to run domain name searches, we don't understand your basis for doing so and ask that you explain. These emails are not privileged and are all responsive so the burden of gathering and producing them should be minimal.

Fifth, we do not agree to your proposal to start searches of Mr. Laurence's emails on September 27, 2024, nor do we understand the significance of that date. Instead, we ask that you please pull Mr. Laurence's documents from the time when the Debtors started considering a restructuring, whether in or out of court. We also reiterate our request that you please run searches from the earliest date Ducera and Alix Partners were discussing a potential engagement with the Debtors, rather than the date the engagement letters were formally executed. Please confirm on this point.

Sixth, we think there are other relevant project names that should be included: Project Bookshelf, Project Vitality and Project Pluto.

In light of the above, we think the most efficient way to move the conversation forward will be for Debtors to please share with us a hit report on the various proposed terms (with revised time periods) and ask that you please share that with us as soon as possible.

Best,

Erin Smith | Associate

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From: Sullivan, Brady M. <BSullivan@willkie.com>

Sent: Monday, November 25, 2024 11:51 AM

To: Smith, Erin <erin.smith@whitecase.com>; Grinnell, Kaydene <KGrinnell@willkie.com>; Hershey, Samuel <sam.hershey@whitecase.com>; Lauria, Thomas E <tlauria@whitecase.com>; Shore, Christopher <cshore@whitecase.com>; Zatz, Andrew <azatz@whitecase.com>; Bakemeyer, Brett <brett.bakemeyer@whitecase.com>; Chen, Tony <tony.chen@whitecase.com>; Chen, Ken <ken.chen@whitecase.com>; Chemborisov, Gleb <gleb.chemborisov@whitecase.com>; Yoo, Jade <jade.yoo@whitecase.com>; Kates, Paula <paula.kates@whitecase.com>

Cc: Dugan, James <jdugan@willkie.com>; Lombardi, Stuart <slombardi@willkie.com>; Morton, Edmon (External) <EMorton@ycst.com>; Lunn, Matthew (External) <mlunn@ycst.com>; Mielke, Allison S. <AMielke@ycst.com>; Borovinskaya, Shella <SBorovinskaya@ycst.com>; Kass-Gergi, Yara <YKass-Gergi@willkie.com>; Sinclair, Debra <DSinclair@willkie.com>; FRGWillkie <FRGWillkie@willkie.com>; Michael J. Farnan <mfarnan@farnanlaw.com>

Subject: [EXT] RE: RE: In re Franchise Group, Inc., et al.; Case No 24-12480 (JTD) (Discovery Responses and Objections)

Erin,

We write in response to your proposed search protocol for the Ad Hoc Group of Freedom Lenders' First RFPs in Connection with the Second Day Motions. Please see the attached markup, which sets forth a compromise position that we believe will get you what you need without forcing the Debtors to review tens of thousands of documents, many of which are not remotely relevant to the Second Day Motions.

We would like to provide a little more color on our counterproposal. As an initial matter, your proposed search parameters resulted in over 50,000 hits, and that is not even including custodial documents the Debtors have already reviewed and produced. That is one overarching reason why we will not agree to your search parameters.

Another is that the proposed search terms resulted in a number of false hits. For example, standalone terms like "financing" or "facility" or "restructuring" or "out of court" pull in a large volume of documents that have nothing to do with this proceeding, let alone the Second Day Motions (e.g., SEC filings, finance documents, unrelated Company deals, etc.). "Fusion" is also driving a lot of false hits. As just one example, for Laurence, American Freight appears to have a processing system referred to as "Fusion." We'll note that Fusion also results in false hits for Chris Grubb in connection with an unrelated Ducera engagement. We will agree to run "Fusion" on the advisors for now because the volume of false hits is manageable, but we reserve rights. And for the advisors, FRG-related strings with broad proximity terms such as "cash flow" or "projections" are not

tethered to the Second Day Motions.

Part of the problem here also is that your proposed terms are simply unworkable for Mr. Laurence if we keep the date range as January 1, 2022 – November 6, 2024. We have adjusted the date range for his email search to correspond more closely to the Board's consideration of the DIP financing.

With respect to the domain searches, for purposes of the Second Day Hearing, we will not review every single email exchanged with the advisors.

This is all to say we have begun review of the additional documents that hit on the search terms set forth in the revised protocol. We anticipate completing these additional productions reasonably in advance in the scheduled depositions.

You mentioned "technical issues" with respect to four documents listed below. Those were zip files we produced with "technical slipsheets," which is what you are seeing. For the zip files, we extracted all the family members as separate documents and produced those, as members of the same family, which I understand is standard ESI practice.

Regards,
Brady

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From: Smith, Erin <erin.smith@whitecase.com>

Sent: Wednesday, November 20, 2024 6:54 PM

To: Grinnell, Kaydene <KGrinnell@willkie.com>; Hershey, Samuel <sam.hershey@whitecase.com>; Lauria, Thomas E <tlauria@whitecase.com>; Shore, Christopher <cshore@whitecase.com>; Zatz, Andrew <azatz@whitecase.com>; Bakemeyer, Brett <brett.bakemeyer@whitecase.com>; Chen, Tony <tony.chen@whitecase.com>; Chen, Ken <ken.chen@whitecase.com>; Chemborisov, Gleb <gleb.chemborisov@whitecase.com>; Yoo, Jade <jade.yoo@whitecase.com>; Kates, Paula <paula.kates@whitecase.com>

Cc: Dugan, James <jdugan@willkie.com>; Lombardi, Stuart <slombardi@willkie.com>; Morton, Edmon (External) <EMorton@ycst.com>; Lunn, Matthew (External) <mlunn@ycst.com>; Mielke, Allison S. <AMielke@ycst.com>; Borovinskaya, Shella <SBorovinskaya@ycst.com>; Kass-Gergi, Yara <YKass-Gergi@willkie.com>; Sinclair, Debra <DSinclair@willkie.com>; FRGWillkie <FRGWillkie@willkie.com>; Michael J. Farnan <mfarnan@farnanlaw.com>

Subject: RE: RE: In re Franchise Group, Inc., et al.; Case No 24-12480 (JTD) (Discovery Responses and Objections)

*** EXTERNAL EMAIL ***

Kaydene and Willkie Team:

We write to follow up on the Debtors' proposed search terms and other outstanding items from the parties' meet and confers to date.

Search Terms

Consistent with the Debtors obligations under the Rules, the Debtors should have sent the Ad Hoc Group your proposed search terms for review and comment so that we might have reached agreement on the terms before you spent time and money running searches without any input from our Group. See Rule 7026-3(e) ("The parties shall confer and in good faith attempt to reach agreement as to the method of searching, and the words, terms, and phrases to be searched with the assistance of the respective e-discovery liaisons, who are charged with familiarity with the parties' respective systems.").

The search terms you have proposed do not work and we will need to work together efficiently now to address their deficiencies.

First, the Debtors' current search terms are too narrowly drawn and are likely to miss relevant documents and communications. For example:

- "DIP" should be run as a search term without limiting phrases. The Debtors proposed searches would only hit on relevant documents if they refer to a negotiating parties' position (ABL Lender, First Lien, Second Lien) or refer to an alternative plan as such. and it is unlikely that every communication would include such a reference.
- "DIP Budget" should be run as a search term without limiting phrases.
- "financing proposal" or "restructuring proposal" will likely miss email that refer in shorthand to a "financing" or "facility" or "proposal"
- "2Ls" or 2nd Liens or Second Liens should not be searched for in the plural form only. This term would miss any discussion of a 2L proposal or treatment of 2L holders.

Second, the Debtors' current search terms are missing critical phrases that reflect the language actually used in negotiating a DIP or an alternative financing. For example:

- Rather than using the term "DIP" alone, we think it likely that negotiating parties may have referred to post-petition financing or out-of court financing alternatives in various terms. At a minimum, the Debtors will need to include other words, for example "post-petition," "cash collateral," "financing," "facility" and "out of court" to capture all relevant documents and communications about the DIP or any alternatives considered.
- Debtors' proposed search terms are completely missing search strings to return cash flows, projections, and budgets. As we have discussed several times, this basic financial information is a priority item for the Freedom Lender Group.
- Debtors proposed search terms do not include negotiations of the RSA which is cross-referenced with the DIP negotiations.
- The Debtors' proposed search terms do not include a single project name. In the minimal discovery produced to date, we have seen a reference to Project Fusion. There may be others. Any project names used by the Debtors and their advisors in connection with matters relevant to

the Second Day Hearing should be included.

Third, your search terms do not include the domain names for the parties involved in the relevant negotiations. We think that they should.

- Domain names should include, at minimum, @paulhastings.com @lazard.com; the domain names of the DIP Lenders involved in the negotiations (including @oaktree.com, @guggenheimpartners, etc.) and the domain names of the ABL Lenders and their advisors.

In light of the above, our revisions to the search parameters you circulated are below. We request that you run these search terms as soon as possible to supplement the Debtors' rolling productions.

Search Parameters

Andy Laurence: (January 1, 2022-November 6, 2024)

1. "DIP" OR "financing" OR "facility" OR "restructuring" or "out of court" OR "out-of-court" OR "post petition" or "post-petition" OR "cash collateral" OR "RSA"
2. Fusion
3. "DIP budget" OR ("DIP" w/25 "budget") OR "cash flow" or "projections" OR "13 week" or "13 wk"
4. "DIP" w/25 ("HoldCo" OR "hold co" OR "Holdings" OR "Freedom")
5. "DIP" w/25 ("2L" OR "Second Lien" OR "2nd Lien")
6. A search string to get all communications with the negotiating parties by search for those domain names. For example: (@paulhastings.com OR lazard.com OR [Domain names of the DIP Lenders] OR [Domain names of the ABL Lenders and their advisors])

Chris Grubb: (June 27, 2024- November 6, 2024) and David Orlofsky: (July 29, 2024 - November 6, 2024)

7. ("Franchise Group" OR "FRG" OR "Fusion") w/25 ("DIP" OR "financing" OR "facility" OR "restructuring" OR "out of court" OR "out-of-court" OR "post petition" OR "post-petition" OR "cash collateral" OR RSA)
8. ("Franchise Group" OR "FRG" OR "Fusion") w/25 "DIP Budget" OR ("DIP" w/25 "budget") OR "cash flow" OR "projections" OR "13 week" OR "13 wk"
9. ("Franchise Group" OR "FRG" OR "Fusion") AND "DIP w/25 ("HoldCo" OR "hold co" OR "Holdings" OR "Freedom")
10. ("Franchise Group" OR "FRG" OR "Fusion") AND "DIP" w/25 ("2L or "Second Lien" OR "2nd Lien")

11. ("Franchise Group" OR "FRG" OR "Fusion") AND ([search string with relevant domain names of negotiating parties and their advisors])

Other Follow Up

We reiterate the request we made during yesterday's meet and confer that the start date for collecting emails from Christopher Grubb and David Orlofsky should be the start of their discussions with FRG and not the date an engagement letter was formally executed. Please confirm that Debtors will do so.

As discussed, there are technical issues with respect to certain documents the Debtors have produced. Please re-produce the documents at the below bates numbers with your next rolling production:

- FRG00000121
- FRG00000424
- FRG00000700
- FRG00000990

Please let us know when Debtors propose a meet and confer on the Disclosure Statement and Plan Discovery we served last weekend. Please also confirm that you will send us your proposed search terms and custodians for that discovery so that we may provide input and attempt to reach agreement on the proper scope of search terms and custodians in compliance with the Rules.

Best,
Erin

Erin Smith | Associate

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From: Grinnell, Kaydene <KGrinnell@willkie.com>

Sent: Wednesday, November 20, 2024 7:28 AM

To: Hershey, Samuel <sam.hershey@whitecase.com>; Lauria, Thomas E <tlauria@whitecase.com>; Shore, Christopher <cshore@whitecase.com>; Zatz, Andrew <azatz@whitecase.com>; Smith, Erin <erin.smith@whitecase.com>; Bakemeyer, Brett <brett.bakemeyer@whitecase.com>; Chen, Tony <tony.chen@whitecase.com>; Chen, Ken <ken.chen@whitecase.com>; Chemborisov, Gleb <gleb.chemborisov@whitecase.com>; Yoo, Jade <jade.yoo@whitecase.com>; Kates, Paula <paula.kates@whitecase.com>

Cc: Dugan, James <jdugan@willkie.com>; Lombardi, Stuart <slombardi@willkie.com>; Morton, Edmon (External) <EMorton@ycst.com>; Lunn, Matthew (External) <mlunn@ycst.com>; Mielke, Allison S. <AMielke@ycst.com>; Borovinskaya, Shella <SBorovinskaya@ycst.com>; Kass-Gergi, Yara <YKass-Gergi@willkie.com>; Sinclair, Debra <DSinclair@willkie.com>; FRGWillkie <FRGWillkie@willkie.com>

Subject: [EXT] RE: RE: In re Franchise Group, Inc., et al.; Case No 24-12480 (JTD) (Discovery Responses and Objections)

Sam,

As discussed during our meet and confer, please find below the search parameters for our email collection. These email searches were conducted in addition to our collections of specified files such as Board meeting agendas and materials, financial statements, D&O policies, bank statements, DIP

marketing communications and materials, Ducera's internal database, tax filings, and other identifiable sets of responsive documents.

Search Parameters

Andy Laurence: (January 1, 2022-November 6, 2024)

1. ("financing proposal" OR "restructuring proposal") w/15 ("ABL Lender" OR "third-party")
2. ("First Lien" OR "1st Lien" OR "1L") w/10 DIP
3. ("financing proposal" OR "restructuring proposal") w/15 ("2Ls" or "2nd Liens" OR "Second Liens")
4. "DIP" w/10 (option* OR alternative* OR best OR reasonable)
5. "DIP" w/10 "Cash collateral"
6. (Negotia* OR Prepar*) w/10 "DIP budget"
7. "HoldCo Debtors" AND (("unsecured guarantors" w/5 "DIP") OR proceed* OR benefi*)

Chris Grubb: (June 27, 2024- November 6, 2024) and David Orlofsky: (July 29, 2024 - November 6, 2024)

1. ("Franchise Group" OR "FRG") w/25 ("financing proposal OR "restructuring proposal") w/15 ("ABL Lender" OR "third-party")
2. ("Franchise Group" OR "FRG") w/25 ("First Lien" OR "1st Lien" OR "1L") w/10 DIP
3. ("Franchise Group" OR "FRG") w/25 ("financing proposal" OR "restructuring proposal") w/15 ("2Ls" or "2nd Liens" OR "Second Liens")
4. ("Franchise Group" OR "FRG") w/25 ("DIP" w/10 (option* OR alternative* OR best OR reasonable))
5. ("Franchise Group" OR "FRG") w/25 ("DIP" w/10 "Cash collateral")
6. ("Franchise Group" OR "FRG") w/25 ((Negotia* OR Prepar*) w/10 "DIP budget")
7. ("Franchise Group" OR "FRG") w/25 ("HoldCo Debtors" AND (("unsecured guarantors" w/5 "DIP") OR proceed* OR benefi*))

Best,

Kaydene

Kaydene Grinnell

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From: Hershey, Samuel <sam.hershey@whitecase.com>

Sent: Tuesday, November 19, 2024 7:35 AM

To: Grinnell, Kaydene <KGrinnell@willkie.com>; Lauria, Thomas E <tlauria@whitecase.com>; Shore, Christopher <cshore@whitecase.com>; Zatz, Andrew <azatz@whitecase.com>; Smith, Erin <erin.smith@whitecase.com>; Bakemeyer, Brett <brett.bakemeyer@whitecase.com>; Chen, Tony

<tony.chen@whitecase.com>; Chen, Ken <ken.chen@whitecase.com>; Chemborisov, Gleb <gleb.chemborisov@whitecase.com>; Yoo, Jade <jade.yoo@whitecase.com>; Kates, Paula <paula.kates@whitecase.com>

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Subject: RE: RE: In re Franchise Group, Inc., et al.; Case No 24-12480 (JTD) (Discovery Responses and Objections)

*** EXTERNAL EMAIL ***

Thank you

Samuel P. Hershey | Partner

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WHITE & CASE

From: Grinnell, Kaydene <KGrinnell@willkie.com>

Sent: Tuesday, November 19, 2024 7:33 AM

To: Hershey, Samuel <sam.hershey@whitecase.com>; Lauria, Thomas E <tlauria@whitecase.com>; Shore, Christopher <cshore@whitecase.com>; Zatz, Andrew <azatz@whitecase.com>; Smith, Erin <erin.smith@whitecase.com>; Bakemeyer, Brett <brett.bakemeyer@whitecase.com>; Chen, Tony <tony.chen@whitecase.com>; Chen, Ken <ken.chen@whitecase.com>; Chemborisov, Gleb <gleb.chemborisov@whitecase.com>; Yoo, Jade <jade.yoo@whitecase.com>; Kates, Paula <paula.kates@whitecase.com>

Cc: Dugan, James <jdugan@willkie.com>; Lombardi, Stuart <slombardi@willkie.com>; Morton, Edmon (External) <EMorton@ycst.com>; Lunn, Matthew (External) <mlunn@ycst.com>; Mielke, Allison S. <AMielke@ycst.com>; Borovinskaya, Shella <SBorovinskaya@ycst.com>; Kass-Gergi, Yara <YKass-Gergi@willkie.com>; Sinclair, Debra <DSinclair@willkie.com>; FRGWillkie <FRGWillkie@willkie.com>

Subject: [EXT] RE: RE: In re Franchise Group, Inc., et al.; Case No 24-12480 (JTD) (Discovery Responses and Objections)

Hi Sam,

Yes, 3:30 works for us. I will send you a calendar invite.

Kaydene Grinnell

Willkie Farr & Gallagher LLP

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From: Hershey, Samuel <sam.hershey@whitecase.com>

Sent: Tuesday, November 19, 2024 7:11 AM

To: Grinnell, Kaydene <KGrinnell@willkie.com>; Lauria, Thomas E <tlauria@whitecase.com>; Shore, Christopher <cshore@whitecase.com>; Zatz, Andrew <azatz@whitecase.com>; Smith, Erin <erin.smith@whitecase.com>; Bakemeyer, Brett <brett.bakemeyer@whitecase.com>; Chen, Tony <tony.chen@whitecase.com>; Chen, Ken <ken.chen@whitecase.com>; Chemborisov, Gleb <gleb.chemborisov@whitecase.com>; Yoo, Jade <jade.yoo@whitecase.com>; Kates, Paula <paula.kates@whitecase.com>

Cc: Dugan, James <jdugan@willkie.com>; Lombardi, Stuart <slombardi@willkie.com>; Morton, Edmon (External) <EMorton@ycst.com>; Lunn, Matthew (External) <mlunn@ycst.com>; Mielke, Allison S. <AMielke@ycst.com>; Borovinskaya, Shella <SBorovinskaya@ycst.com>; Kass-Gergi, Yara <YKass-Gergi@willkie.com>; Sinclair, Debra <DSinclair@willkie.com>; FRGWillkie <FRGWillkie@willkie.com>

Subject: RE: RE: In re Franchise Group, Inc., et al.; Case No 24-12480 (JTD) (Discovery Responses and Objections)

*** EXTERNAL EMAIL ***

Hi Kaydene, could we do 3:30? Please let us know. If not we will make 2:30 work.

Samuel P. Hershey | Partner

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WHITE & CASE

From: Grinnell, Kaydene <KGrinnell@willkie.com>

Date: Monday, Nov 18, 2024 at 22:25

To: Hershey, Samuel <sam.hershey@whitecase.com>; Lauria, Thomas E <tlauria@whitecase.com>; Shore, Christopher <cshore@whitecase.com>; Zatz, Andrew <azatz@whitecase.com>; Smith, Erin <erin.smith@whitecase.com>; Bakemeyer, Brett <brett.bakemeyer@whitecase.com>; Chen, Tony <tony.chen@whitecase.com>; Chen, Ken <ken.chen@whitecase.com>; Chemborisov, Gleb <gleb.chemborisov@whitecase.com>; Yoo, Jade <jade.yoo@whitecase.com>; Kates, Paula <paula.kates@whitecase.com>

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Subject: [EXT] RE: In re Franchise Group, Inc., et al.; Case No 24-12480 (JTD) (Discovery Responses and Objections)

Sam,

We are available tomorrow at 2:30 pm ET. Please let us know if that works on your end.

Kaydene Grinnell
Willkie Farr & Gallagher LLP
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kgrinnell@willkie.com | vCard | [www.willkie.com bio](http://www.willkie.com/bio)

From: Hershey, Samuel <sam.hershey@whitecase.com>

Sent: Monday, November 18, 2024 10:08 PM

To: Grinnell, Kaydene <KGrinnell@willkie.com>; Lauria, Thomas E <tlauria@whitecase.com>; Shore, Christopher <cshore@whitecase.com>; Zatz, Andrew <azatz@whitecase.com>; Smith, Erin <erin.smith@whitecase.com>; Bakemeyer, Brett <brett.bakemeyer@whitecase.com>; Chen, Tony <tony.chen@whitecase.com>; Chen, Ken <ken.chen@whitecase.com>; Chemborisov, Gleb <gleb.chemborisov@whitecase.com>; Yoo, Jade <jade.yoo@whitecase.com>; Kates, Paula <paula.kates@whitecase.com>

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Subject: RE: In re Franchise Group, Inc., et al.; Case No 24-12480 (JTD) (Discovery Responses and Objections)

*** EXTERNAL EMAIL ***

Thank you. Please let us know when you can meet and confer regarding these responses and objections.

Samuel P. Hershey | Partner
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WHITE & CASE

From: Grinnell, Kaydene <KGrinnell@willkie.com>

Sent: Monday, November 18, 2024 8:35 PM

To: Lauria, Thomas E <tlauria@whitecase.com>; Shore, Christopher <cshore@whitecase.com>; Zatz, Andrew <azatz@whitecase.com>; Hershey, Samuel <sam.hershey@whitecase.com>; Smith, Erin <erin.smith@whitecase.com>; Bakemeyer, Brett <brett.bakemeyer@whitecase.com>; Chen, Tony <tony.chen@whitecase.com>; Chen, Ken <ken.chen@whitecase.com>; Chemborisov, Gleb <gleb.chemborisov@whitecase.com>; Yoo, Jade <jade.yoo@whitecase.com>; Kates, Paula <paula.kates@whitecase.com>

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Subject: [EXT] In re Franchise Group, Inc., et al.; Case No 24-12480 (JTD) (Discovery Responses and Objections)

Counsel,

Please see the attached, sent on behalf of the Debtors in the above captioned proceeding.

Best,
Kaydene

Kaydene Grinnell
Willkie Farr & Gallagher LLP
787 Seventh Avenue | New York, NY 10019-6099
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